

UNITED STATES DISTRICT COURT
THE DISTRICT OF MASSACHUSETTS

ANNA MARIA CROWE, KATHLEEN
O'DAY, JOANNE CLARKE, DIANE
BOWEN, and TIA FINLEY on behalf
of themselves and all others similarly
situated,

Plaintiffs,

v.

EXAMWORKS, INC., EXAMWORKS
GROUP, INC., MES GROUP, INC.
AND CRYSTAL PATMORE,

Defendants.

United States District Court

Civil Action No. 1:13-cv-10249DPW

**DEFENDANTS' MOTION TO DISMISS THE CLAIMS
OF OPT-IN PLAINTIFF JEANNE ALBRECHT**

NOW COME Defendants ExamWorks, Inc., ExamWorks Group, Inc., MES Group, Inc., and Crystal Patmore (collectively, "Defendants") and hereby move, pursuant to Fed. R. Civ. P. 37(d) to dismiss the claims brought by Opt-In Plaintiff Jeanne Albrecht. In support thereof and as set forth in detail in Defendants' accompanying memorandum of law, Defendants state that Ms. Albrecht has ignored her fundamental discovery obligations including, but not limited to, refusing to appear for her deposition or to produce any documents in violation of the Court's Order dated June 20, 2014. See Docket No. 119.

WHEREFORE, Defendants respectfully request that the Court issue an Order dismissing, with prejudice, all claims brought by Opt-In Plaintiff Jeanne Albrecht.

Dated: September 9, 2014

Respectfully submitted,

EXAMWORKS, INC., MES GROUP, INC.,
EXAMWORKS GROUP, INC., and
CRYSTAL PATMORE

By their attorneys,

/s/ David L. Hansen

Mark J. Ventola, Esq. BBO# 549570

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CERTIFICATE OF SERVICE

I, David L. Hansen, do hereby certify that the foregoing was filed with the Court through the ECF system and electronically served this 9th day of September 2014.

/s/ David L. Hansen

David L. Hansen

REQUEST FOR ORAL ARGUMENT

Defendants respectfully request that the Court schedule a hearing for oral argument on their Motion.

CERTIFICATION OF COMPLIANCE WITH LOCAL RULES 7.1(2) and 37.1

I, David L. Hansen, hereby certify that, as set forth in the Background Section of the accompanying Memorandum of Law, I, have attempted to confer with counsel for the Plaintiffs in an effort to resolve the pending discovery dispute. Mark J. Ventola has also discussed the Motion with Daniel Rice.

/s/ David L. Hansen
David L. Hansen